

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF JOSEPHINE
BRINDA

DECLARATION OF JOSEPHINE BRINDA

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
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DECLARATION OF JOSEPHINE BRINDA

I, Josephine Brinda, hereby declare:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I live in Minneapolis, Minnesota with my husband and our two children, who are 16 and 13. I work for a hospital system and my husband works in economic development.

3. My youngest child, M.B., is transgender. She was assigned male sex at birth, but her gender identity is female.

4. My daughter first came out as non-binary when she about four years old. From a very young age, she always gravitated toward skirts, dresses, and tutus. As parents, we wanted to provide her a space where she was comfortable expressing herself and discovering her own identity and trusted that our daughter knows how she feels and identifies.

5. M.B. told us that she identifies as female in fourth grade because she was going on a school trip and had to make a choice about whether she wanted to be in the boys' or girls' dorm. She chose to stay in the girls' dorm. We are lucky that her school was supportive of her and her identity.

6. Approximately two and a half years ago, we started the process of getting her gender-affirming medical care. We met with a mental health provider, her primary care doctor, as well as a gender specialist.

7. About a year ago, when she reached stage two on the Tanner scale, our daughter started taking a puberty blocker. She has a plan to start taking estrogen in the near future, which we fully support.

8. My daughter is a remarkable child with a very strong sense of self. While she experiences dysphoria, she has an incredibly mature perspective on her treatment options and how she wants to present herself to the world.

9. It was not a difficult decision for my husband and I to support our daughter in her transition. She is our child, and we love her, and this is like anything else—if your child has a medical need, you provide them with care. That is part of being a supportive and caring parent—it truly is that simple. For her, this is healthcare, and she is just looking to exist as herself. There is no other agenda.

10. It's horrifying that my child has to feel anxious about being threatened or targeted just for being who she is. The Executive Order banning gender-affirming care for minors only heightens these anxieties. As a society, we are supposed to teach our children to be accepting and not to be bullies, but my child is now facing harassment that is encouraged by adults and institutions. It does not make sense—why would anyone hate her just for living.


11. It would be incredibly harmful to M.B. to not be able to receive gender-affirming care, which is a validation of her existence. Sadly, she's aware that pursuing this medical care could threaten her safety, as well as harm me and my husband for authorizing her gender-affirming medical care. This is a risk we cannot accept.

12. We have started having conversations as a family about moving out of the United States so that our daughter can continue to access necessary healthcare. We do not want to move; my husband and I both have jobs that we care about that are based locally. We would have to leave our community. Our oldest child has started looking at colleges, and we might have to be separated from them. But, if this Executive Order stays in place, we will have to move to protect our daughter's health, her life, as well as me and my husband. It is terrifying that providing care and support to my daughter could be criminally prosecuted or considered abuse.

13. I have decided to use my daughter's initials in this declaration to protect M.B. and my family from any acts of hatred or violence. Because of the policies expressed in the Executive Order, my family has to fear for our safety. Gender-affirming care is healthcare. My daughter does not have an agenda by identifying as female, she is a person trying to pursue her passions and live her life to the fullest.

I declare under penalty of perjury under the law that the foregoing is true and correct to the best of my knowledge.

Executed this 5th day of February, 2025, in Minneapolis, Minnesota, Hennepin County.


Josephine Brinda (Feb 5, 2025 13:38 CST)

Josephine Brinda